



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

June 11, 2021

Robert Hoelscher
District Ranger
Pinedale Ranger District
Bridger-Teton National Forest
PO Box 220
Pinedale, WY 82941

Dear Mr. Hoelscher,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Bridger-Teton National Forest's (BTNF) scoping notice to analyze changes in livestock management on the Elk Ridge Complex Rangeland Supplementation Project (Elk Ridge Complex).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA appreciates the BTNF's concerted effort to utilize the vacated Elk Ridge Complex for cattle grazing. We understand the circumstances for the previous permittee waiving the permit without preference and support on-going efforts to restock the allotments with cattle. Given the 1978 decision to allow 725 cow/calf pairs on the Elk Ridge Complex, as well as extensive vegetation monitoring data, we believe the current analysis should support a similar conclusion.

Proposed Action:

The Proposed Action states it will authorize cattle grazing on the Elk Ridge Complex and utilize the rotational grazing system of the adjacent allotments analyzed in the Upper Green River Area Rangeland Project. While we support analyzing this as an alternative, we have some concerns and offer the following comments to broaden the analysis.

The Proposed Action does not include any range improvements in the analysis. We understand this simplifies the analysis, however, it may not meet the Purpose and Need, which states "*manage livestock grazing in a manner that allows the health of the land to be sustained and to meet the goals and objectives of the 1990 Bridger-Teton Land and Resource Management Plan with Amendments (Bridger-Teton Forest Plan).*"

We support analyzing strategically placed fences, both permanent and temporary electric, along with potential water developments in the analysis to ensure grazing permittees are provided every opportunity to successfully manage cattle grazing, while meeting desired conditions for resources, especially riparian areas. We believe the BTNF should

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identify existing fence lines and water developments and include these in the inventory and allow for maintenance activities of these improvements.

We are aware of existing trails from Tosi Basin, where cattle could enter or leave the Elk Ridge Complex into the Gros Ventre or Bondurant areas. Additionally, allotments such as Beaver Twin to the south of the Elk Ridge Complex could have trails between any of the four allotments and allow cattle to intersperse. We suggest the BTNF consider fences across these trails to reduce interspersing of cattle into adjacent allotments.

Expand Range of Alternatives:

The WDA is also concerned the Proposed Action may be too narrow in scope. We recommend consideration of broadening the scope to allow the most flexibility for potential use of the Elk Ridge Complex. The 1978 Elk Ridge Complex analysis approved 725 cow/calf pairs. We are concerned the Proposed Action would absorb these appropriated Animal Unit Months (AUMs), which ultimately is a loss of AUMs to the livestock grazing industry. We request the Elk Ridge Complex EA analyze the existing AUMs for conversion from sheep to cattle, retain the appropriated AUMs, and tie them directly to the Elk Ridge Complex, to allow greater flexibility for future adaptive management.

For example, perhaps the grazing permittee in Beaver Twin may want to increase the number of cow/calf pairs or yearlings and graze these in conjunction with the Elk Ridge Complex. Another example might include authorizing the AUMs to a young agriculture producer who is not currently authorized or permitted to graze under the US Forest Service system. A third example might allow annual use through Temporary Use Permits by different permittees impacted by drought or wildfire needing forage for one or two summers.

Allowable-Use Standards:

The WDA is concerned the Proposed Action is requiring very restrictive standards, which is inconsistent with the Upper Green Record of Decision (ROD). If the BTNF selected the Proposed Action as the Preferred Alternative in the Decision Record, the Upper Green cattle permittees would have different expectations and much tighter restrictions to follow in the Elk Ridge Complex. The Upper Green ROD identifies the following stream bank stability and alteration objectives and guideline language, but not "standard."

"The stream bank stability objective is 80%. The streambank alteration guideline is 20% for most areas, as defined in the Forest Plan. Streambank alteration is just one indicator of streambank stability. Streambank alteration is an annual or short term measurement assists managers in accomplishing streambank stability objectives. Riparian systems capture sediment, maintain a high water table, and support hydric vegetation that is capable of slowing high flows, and protects and stabilizes the stream banks."

The Proposed Action for Elk Ridge states:

"Streambank Alteration Standard: No more than 20% of the total streambank length, within any given stream reach, would be allowed to show streambank alteration as defined by Burton, Cowley, and Smith (2008) and Simon (2008) caused by the hoof action of large herbivores during the current livestock grazing season."

We are also concerned with the interpretation and implementation of the above-mentioned standard. The Cowley Multiple Indicator Manual (2008) does not identify streambank alteration measurements as a standard, but rather uses "objectives." The following excerpts are from the Cowley (2008) manual.

"The average percent use should not be used as a grazing use standard, but rather it should be an indication of the browsing impacts within a use class range. For example, if the woody species use is 38 percent, which is in the upper part of the light category, the amount of use should be described as light to moderate. This provides managers with information necessary to determine if the management prescription is likely making progress toward the objectives or if adjustments to the management prescription should be considered."

"Short-term indicators provide information necessary to help determine whether the current season's livestock grazing is meeting grazing use criteria. They can be used as early warning indicators that current grazing impacts may prevent the achievement of management objectives and can also be used to help explain changes in riparian vegetation and channel conditions over time."

"Long-term indicators provide data to assess the current condition and trend of streambanks, channels, and streamside vegetation. They help determine if local livestock grazing management strategies and other land management actions are making progress toward achieving the long-term goals and objectives for streamside riparian vegetation and aquatic resources." (Cowley 2008)

Additionally, the Streambank Alteration Standard states *"no more than 20% of the total streambank length, within any given stream reach..."* This statement undermines the intent of identifying and selecting a "Designated Monitoring Area" or DMA. The Cowley 2008 manual identifies three DMAs; Representative, Critical, and Reference. As proposed, the Streambank Alteration Standard would allow anyone to collect data outside of the DMA, including a stream crossing, and state the 20% alteration standard was exceeded. The streambank alteration guideline should only apply to the appropriated DMA, given it's a "representative" site.

The Proposed Action also includes a Forage Utilization Standard for riparian of 4 to 6 inches, as well as a Forage Utilization Standard for upland at a maximum of 50% utilization. We urge the BTNF to replace them as guidelines. Instances may arise where the BTNF could utilize livestock grazing as a vegetation management tool to shift plant communities by increased utilization to benefit wildlife habitat.

BOA Policies:

The WDA Board of Agriculture (BOA) recently met and revised their Policy Book by including the following policies for consideration of federal agency action, including decisions such as the Elk Ridge Complex:

"The BOA strongly opposes closure of grazing allotments on federal lands. When a permit is waived without preference, the BOA recommends the federal agencies work with the WDA to provide other interested livestock operators the opportunity to apply for the permits. If no permittee is interested then the BOA supports the allotments be left vacant."

Adopted: March 17, 2021

"The BOA supports keeping a current list of all forage reserves and vacant allotments, as well as pursuing the needed actions to move these allotments to active use, including monitoring and NEPA."

Adopted: March 17, 2021

"Grazing is a tool to enhance natural resources to meet desired goals. Therefore, the BOA desires grazing land management to protect the no net loss of AUMs. No net loss includes, but not limited to drought, the ability to sell permits, and historical sites."

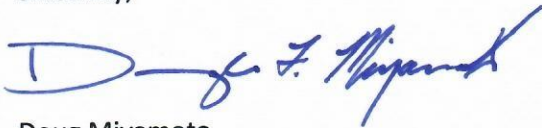
Reviewed/Retained: March 17, 2021

"The BOA supports keeping all existing federal allotments open to grazing."

Adopted: March 17, 2021

Again, we appreciate the efforts of the BTNF to graze the vacant allotments on the Elk Ridge Complex. We look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
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